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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
NEWARK VICINAGE**

OCCIDENTAL CHEMICAL CORPORATION,

Plaintiff,

v.

21ST CENTURY FOX AMERICA, INC.;
3M COMPANY; A.E. STALEY
MANUFACTURING COMPANY; AKZO
NOBEL COATINGS, INC.; ALDEN LEEDS
INC.; ALLIANCE CHEMICAL INC.;
AMERICAN INKS & COATINGS
CORPORATION; APOLAN
INTERNATIONAL, INC.; ARKEMA INC.;
ASHLAND LLC; ATLANTIC RICHFIELD
COMPANY; ATLAS REFINERY, INC.;
AVENTISUB LLC; BASF CATALYSTS LLC;
BASF CORPORATION; BATH IRON WORKS
CORPORATION; BENJAMIN MOORE & CO.;
BEROL CORPORATION; BORDEN &
REMINGTON CORP.; CAMPBELL
FOUNDRY COMPANY; CANNING GUMM
LLC; CBS CORPORATION; CHARGEURS
WOOL (USA) INC.; CHARGEURS, INC.;
CHEMTRADE CHEMICALS
CORPORATION; CLEAN EARTH OF NORTH
JERSEY, INC.; CNA HOLDINGS LLC;
COATS & CLARK INC.; CONOPCO, INC.;
COOPER INDUSTRIES, LLC; COVANTA
ESSEX CO.; CRODA INC.; CURTISS-
WRIGHT CORPORATION; DARLING
INGREDIENTS INC.; DII INDUSTRIES, LLC;
E.I. DU PONT DE NEMOURS AND

Hon. Madeline Cox Arleo
Hon. Joseph A. Dickson

Civil Action No. 2:18-CV-11273 (MCA-JAD)

NOTICE OF MOTION

Return Date: November 30, 2018
Oral Argument Requested

COMPANY; EDEN WOOD CORPORATION;
ELAN CHEMICAL CO., INC.; EMERALD
KALAMA CHEMICAL, LLC; ENPRO
INDUSTRIES, INC.; ESSEX CHEMICAL
CORPORATION; EVERETT SMITH GROUP
LTD.; FLINT GROUP INCORPORATED;
FORT JAMES LLC; FOUNDRY STREET
CORPORATION; FOUNDRY STREET
DEVELOPMENT, LLC; FRANKLIN-
BURLINGTON PLASTICS, INC.; GARFIELD
MOLDING COMPANY, INC.; GENERAL
ELECTRIC COMPANY; GIVAUDAN
FRAGRANCES CORPORATION; GOODRICH
CORPORATION; HARRIS CORPORATION;
HEXCEL CORPORATION; HEXION INC.;
HOFFMANN-LA ROCHE, INC.;
HONEYWELL INTERNATIONAL, INC.;
HOUGHTON INTERNATIONAL INC.;
INGREDION INCORPORATED; INNOSPEC
ACTIVE CHEMICALS LLC; INX
INTERNATIONAL INK CO.; ISP
CHEMICALS LLC; JOHNSON & JOHNSON;
KALAMA SPECIALTY CHEMICALS, INC.;
KEARNY SMELTING & REFINING CORP.;
LEEMILT'S PETROLEUM, INC.; LEGACY
VULCAN, LLC; MALLINCKRODT LLC;
MARATHON OIL CORPORATION;
MCKESSON CORPORATION; MELON
LEASING CORPORATION, INC.; MELTSE -
TONNELE AVENUE LLC; MI HOLDINGS,
INC.; NAPPWOOD LAND CORPORATION;
NATIONAL-STANDARD LLC; NEWELL
BRANDS INC.; NOKIA OF AMERICA
CORPORATION; NOVARTIS
CORPORATION; NOVELIS CORPORATION;
NOVEON HILTON DAVIS, INC.; OTIS
ELEVATOR COMPANY; PABST BREWING
COMPANY, LLC; PALIN ENTERPRISES
L.L.C.; PFISTER URBAN RENEWAL
CORPORATION; PHARMACIA LLC; PITT-
CONSOL CHEMICAL COMPANY; PMC
GLOBAL, INC.; PPG INDUSTRIES, INC.;
PUBLIC SERVICE ELECTRIC AND GAS
COMPANY; PURDUE PHARMA
TECHNOLOGIES, INC.; QUALA SYSTEMS,
INC.; QUALITY CARRIERS, INC.; R. T.

VANDERBILT HOLDING COMPANY, INC.;
RECKITT BENCKISER LLC; REVERE
SMELTING & REFINING CORPORATION;
REXAM BEVERAGE CAN COMPANY;
ROSELLE MAUSOLEUM MAINTENANCE
FUND, INC.; ROYCE ASSOCIATES, A
LIMITED PARTNERSHIP; RTC
PROPERTIES, INC.; SAFETY-KLEEN
ENVIROSYSTEMS COMPANY;
SCHIFFENHAUS PACKAGING
CORPORATION; SEQUA CORPORATION;
SETON COMPANY, INC.; SPECTRASERV,
INC.; STALEY HOLDINGS LLC; STANLEY
BLACK & DECKER INC.; STWB INC.; SUN
CHEMICAL CORPORATION; SUNOCO
(R&M), LLC; SUNOCO PARTNERS
MARKETING & TERMINALS L.P.; TATE &
LYLE INGREDIENTS AMERICAS LLC;
TEVAL CORPORATION; THE HARTZ
MOUNTAIN CORPORATION; THE
NEWARK GROUP, INC.; THE OKONITE
COMPANY, INC.; THE SHERWIN-
WILLIAMS COMPANY; TIFFANY AND
COMPANY; UNITED STATES STEEL
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PLEASE TAKE NOTICE that, pursuant to this Court's Pre-Answer Scheduling Order (ECF # 12), on November 30, 2018, or as soon thereafter as counsel may be heard, the undersigned common counsel for a group of defendants referred to as the Small Parties Group (the "SPG"), as identified in Exhibit 1 to the Certification of Joseph H. Blum, Esq., shall move before the Honorable Jose L. Linares, U.S.D.J., for an Order granting SPG Defendants' Motion to Dismiss Plaintiff Occidental Chemical Corporation's Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6).

PLEASE TAKE FURTHER NOTICE that, in support of the within Motion, SPG Defendants shall rely on their Brief and the Certification of Joseph H. Blum, Esq.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is enclosed.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: September 12, 2018

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CERTIFICATE OF SERVICE

I hereby certify that, pursuant to this Court's Pre-Answer Scheduling Order (ECF # 12), on September 12, 2018, a true copy of the within Notice of Motion and all supporting papers were served upon the following counsel:

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Dated: September 12, 2018

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